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PEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Comments on WT Docket No. 98-143

I applaud the efforts of both the FCC and ARRL in attempting to modernize the amateur radio licensing structure. I support the original proposal submitted by the ARRL. This proposal, I feel is in the public interest.

I support the concept of four license classes as proposed by the ARRL, with the suggestions listed below. I must admit, I am suggesting a steep increase in the level of technical expertise required for the classes A&B. I would not expect all persons to be able to attain a class A license. This is the case currently with the Extra class license. However, I propose a shift of emphasis from an ability to operate morse code at high speed, to a technical interest and knowledge of radio.

LICENSE CLASSES:

CLASS D

(formerly Novice/Tech/TechPlus)

This license class should have no morse code examination requirements. A technical examination at the current tech-plus level. This class should convey the current privileges of a the current Tech-plus, with a 200 Watt limit on all bands (HF/VHF/UHF). While this would technically remove high-power VHF/UHF privileges from new technicians, I believe this is a safety issue, and should apply to all bands.

Class C

(formerly General)

This license class should have a 5 words per minute morse code examination requirement. Technical examination requirements should be increased to include operation at higher power levels, operating procedures, emergency communications, and RF safety. This class should convey the current privileges of the General class license.

Class B

(formerly Advanced)

Code test of 10 words per minute, with a technical exam with a level of difficulty of a 2 year associate examination. This class should convey the current privileges of the Advanced class license.

Class A

(formerly Extra)

This class should include a 10 word per minute code exam, and a technical exam at a level equivalent to a college engineering exam. Examination should include aspects of equipment design, AC circuit theory, transmission lines, and electronics. This would restore some of the prestige associated with this license class. This class should convey the current privileges of the Extra class license.

Respectfully submitted,

Joseph J. Brandt, NONYO September 12, 1998